

Mary L Baldwin

Independent Longaberger® National Sales leader

July 10, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)

Re: Business Opportunity Rule, R511993

600 Pennsylvania Avenue, NW

Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because it concerns me directly regarding the proposed Business Opportunity Rule R511993. I believe that in its present form, it could affect my direct selling business as an Independent National Sales Leader with The Longaberger® Company. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but several sections in the proposed rule inhibit my ability to have and continue a career opportunity or offer one to others as well.

One of the most confusing and troublesome sections of the proposed rule is the seven-day waiting period to enroll new Home Consultants. Our starter basic Longaberger business kit is only \$129. People buy TV's, cars, and other items that cost much more than that, and they do not have to wait seven days. This waiting period leaves an impression that there could be something unsuitable with our business opportunity. **I also think this seven-day waiting period is unnecessary because direct selling companies have a 90 percent buy-back policy for all products, including business kits purchased by a salesperson within the last twelve months. In fact, our company's buy-back exceeds the DSA Code of Ethics requirement, which, in my opinion, makes this rule unnecessary.**

Under this waiting period requirement, all sponsoring associates and I would need to maintain very detailed records when we initially speak with someone about joining Longaberger and would then have to send in many reports to my company headquarters.

Additionally, it is my understanding that the proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Longaberger is found guilty. Otherwise, Longaberger and I are put at an unfair advantage even though The Longaberger Company has a pure and honorable history.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very leery about giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references that may be involved in other companies or businesses, including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Longaberger headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to contract as a salesperson: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are understandably anxious about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been an Independent Longaberger Home Consultant for more than 15 years. I became a Longaberger Home Consultant because I loved the products, and I later realized the freedom and advantages of owning my own business. Now my family depends on this extra income to supplement our budget in everyday existence and for life's requirements such as health care and eventually retirement.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and I think there are other alternatives available in achieving its goals that have a much more positive outcome.

Thank you for your time in considering my comments.

Sincerely,
Mary L Baldwin NSL

With Courage.....Extraordinary is Possible!

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